

Response to Comments

Comment Deadline: May 30, 2018 by 5:00 p.m.

Non-Regulatory Amendment to the Water Quality Control Plan for the Colorado River Basin Region (Basin Plan) to Make Administrative, Editorial Changes that Update Language and Graphics Related to the Salton Sea and Correct General Errors (Amendment)

Comment Letter #	Date	Commenter	Affiliation
JG-1	05/01/18	Jeff Geraci	Colorado River Basin Regional Water Quality Control Board, Senior Environmental Scientist Specialist
MJ-1	05/08/18	Mark Johnson	N/A
JG-2	05/10/18	Jeff Geraci	Colorado River Basin Regional Water Quality Control Board, Senior Environmental Scientist Specialist
SD-1	05/30/18	Kelly Rodgers, Ph.D., P.E.	San Diego County Water Authority (SDCWA)
IID-1	05/30/18	Tina Shields, P.E.	Imperial Irrigation District (IID)

Changes proposed in response to comments made on 05/01/18 are incorporated into the Staff Report and Amendment as revised on 05/07/18, unless otherwise noted. All other changes will be reflected in an errata sheet presented with Resolution R7-2018-0018 at the Public Hearing that will be held on June 14. The Amendment is presented in [Attachment B](#) and [Attachment C](#) of Resolution R7-2018-0018. Note that the PDF copies of Attachments B and C contain bookmarks to navigate the document.

Comment #	Location in the Amendment	Comment	Response
JG-1.1	Ch. 1, Sec. V.E, paragraph 3	Tilapia are found throughout both irrigation and drainage canals, as are grass carp, common carp, flatheads, channels, LMB, SMB, bluegill, etc.	This comment addresses existing language in the Basin Plan. Colorado River Basin Regional Water Quality Control Board Staff (Staff) was not able to obtain additional information about fish in drainage canals to further revise this text. Staff does not propose any changes to the Amendment in response to this comment.
JG-1.2	Ch. 1, Sec. V.E, paragraph 3	Also, the sea currently has (3) fish species still living in it, not one.	<p>This comment concerns new language proposed under the Amendment. In response to this comment, Staff proposes to remove the following sentence, initially proposed in the Amendment as released on 04/20/18:</p> <p>As salinity continued to climb and conditions at the sea became increasingly inhospitable to fish, tilapia eventually became the only surviving fish species.</p> <p>This change is reflected in the 05/07/18 revision of the Staff report and Amendment.</p>

Comment #	Location in the Amendment	Comment	Response
JG-1.3	Ch.1, Sec. VI.F, Paragraph 2	I would mention that the sea is ‘federally designated’ as a repository for ag drainage as opposed to ‘serves as an ag reservoir’	This information is presently discussed in the Basin Plan in Chapter 2, Section I, paragraph I. Staff does not propose any changes to the Amendment in response to this comment.
JG-1.4	Ch.1, Sec. VI.F, Paragraph 3	I don’t know that precipitation is a ‘predominant’ contributor to replenishment. Unless we can quantify, I don’t know if I’d make the claim.	<p>To improve clarity, Staff proposes to further revise the sentence as follows:</p> <p><u>Replenishment of the Salton Sea is predominantly from farm drainage and seepage, and with occasional and sometimes significant inflows from storm runoff, from the Coachella Valley, Imperial Valley, and Anza-Borrego area in this Region, and from the Mexicali Valley in Mexico. The gross contributing watershed comprises of about 7,500 square miles.</u></p> <p>These changes are reflected in the 05/07/18 revision of the staff report and Amendment.</p>
JG-1.5	Ch.2, Sec. II, Paragraph 3	It may not be clear to the reader HOW discharging ag waste can maintain salinity balance (i.e. flushing).	<p>Staff proposes to revise the third sentence in the paragraph as follows:</p> <p><u>Agricultural discharges consist of run-off and agricultural tile drainage. Tile drainage comes from subsurface drain systems that remove excess groundwater, thereby helping maintain adequate soil salinity balance for agriculture in the Region.</u></p> <p>These changes are reflected in the 05/07/18 revision of the staff report and Amendment. See response to comment IID-1.8 for final recommendations for this paragraph.</p>
JG-1.6	Ch.3, Sec. III.C.1	There is no ‘official’ TDS concentration for the sea, and it’s certainly not 61,000 in 2017 (do you recall the source where you found that figure?). TDS varies throughout the sea, not just spatially but also along the depth profile. Best to provide a range using an approximate average.	The figure “over 61,000 mg/L” is based on the TDS “whole-sea average” data published by USBR. This figure is an approximation as written. Staff does not propose any changes to the Amendment in response to this comment.

Comment #	Location in the Amendment	Comment	Response
JG-1.7	Ch.4, Sec. IV.B, Paragraph 8 (last)	Selenium in water is <1ug/L, but in sediments it's above the threshold and increasing. How this will be affected as the benthic community changes due to increasing salinity has yet to be seen.	<p>Staff proposes to revise the end of the paragraph in question as follows:</p> <p><u>The Salton Sea was also formerly listed as impaired by selenium, but this pollutant was removed from the list of this water body's impairments in 2012. The Salton Sea's major tributaries, the New River and Alamo River, were still listed as impaired by selenium as of 2012.</u></p> <p>These changes are reflected in the 05/07/18 revision of the staff report and Amendment.</p>
JG-1.8	Ch.4, Sec. IV.B.1.a, Paragraph 1	This would not stabilize salinity; as you remove salt, the salt solids that previously precipitated out of solution will re-dissolve back into solution.	<p>In response to this comment, Staff initially proposed to revise the first sentence for clarity as follows:</p> <p><u>Pump-out proposals postulate that in order to stabilize the salinity level of the Salton Sea, it would be necessary to remove on a continuous basis a salt load equivalent to the salt load delivered by the inflows from the tributaries.</u></p> <p>These changes were reflected in the 05/07/18 revision of the staff report and Amendment. However, after further consideration, Staff proposes to remove the first three sentences in the "Pump-Out Options" section, replacing them with a shorter introduction. This simplified revision would remove outdated information while making the section easier to read. The text would be revised as follows:</p> <p>Since approximately 4 million tons per year of salt are added to the Sea by its tributaries, removing an equal amount of salt from the Sea would be necessary to stabilize the salinity level of the Sea. This could be done by removing about 120,000 acre feet of salty water from the Sea per year. Removing additional salt would begin to lower the salinity to a desired level. Pump-out options for salinity control propose to pump water out of the sea in volumes that would remove the desired amount of salt.</p> <p>These proposed changes will be reflected in the errata sheet.</p>

Comment #	Location in the Amendment	Comment	Response
MJ-1.1	Ch.1, Sec. V.E, Paragraph 2, Sentence 3	Please add "and Coachella Canal" after All American Canal and delete the word "systems."	As written in the August 2017 edition of the Basin Plan, "sections of the All American Canal system" may refer to the All American Canal, its branch canals including Coachella Canal, and/or the irrigation canals. Without additional information about this event, Staff is unable to determine if the language proposed by the commenter is accurate. Staff does not propose any changes to the Amendment in response to this comment.
MJ-1.2	Ch.1, Sec. VI.F, Paragraph 2, Sentence 2	Please add "for agricultural irrigation purposes," after Colorado River	The editorial change proposed by the commenter is not necessary in context. Staff does not propose any changes to the Amendment in response to this comment.
MJ-1.3	multiple	[On] Page 7, Page 12 [of the staff report] and throughout [the Basin Plan, I] suggest using "agricultural land" in lieu of cropland and farmland to be more precise and consistent.	This comment concerns multiple sections of the Amendment and of existing language in the Basin Plan, discussed below as separate comments. The comment is consistent with the purpose of the Amendment, which is in part to correct general errors, including inconsistencies, throughout the Basin Plan.
MJ-1.4	Ch.2, Sec. II, Paragraph 3, Sentence 1	See MJ-1.3	Staff proposes to delete the entire paragraph, as explained in the response to comment IID-1.8.
MJ-1.5	Ch.4, Sec. IV.B.2, Sentence 3	See MJ-1.3	Staff proposes to change the word "farmland" to "agricultural land," as proposed by the commenter, for consistency.
MJ-1.6	Ch.1, Sec. VI.E.1, Paragraph 2, Sentence 2	See MJ-1.3	Excerpt from August 2017 edition of the Basin Plan, unchanged by the proposed Amendment: The New and Alamo Rivers convey agricultural irrigation drainage water from farmlands in the Imperial Valley, surface runoff, and lesser amounts of treated municipal and industrial waste waters from the Imperial Valley. To improve clarity, Staff proposes to remove the words "water from farmlands in the Imperial Valley."

Comment #	Location in the Amendment	Comment	Response
MJ-1.7	Ch.4, Sec. V.G.1, Table 4-25, Watershed Description, Sentence 1	See MJ-1.3	Staff proposes to revise the sentence as follows, for clarity: <i><u>The New River watershed is approximately 500,000 acres (202,350 hectares) in size; with 200,000 acres (80,940 hectares) in the United States that consists primarily of agricultural land of Imperial Valley farmland in the U.S.; and 300,000 acres (121,410 hectares) in Mexico, including the Mexicali metropolitan area and agricultural land that include agricultural and urban land in Mexicali Valley.</u></i>
MJ-1.8	Ch.6, Sec. II.F.2.i.a, Paragraph 2, Sentence 1	See MJ-1.3	Staff proposes to change the word "cropland" to "agricultural land," as proposed by the commenter, for consistency. Additionally, Staff proposes to add a comma after the closing parenthesis for clarity.
MJ-1.9	N/A	Another significant action since the last update of the Basin Plan in 1992 is the development of the Coachella Valley Water Management Plan (CVWMP). [...] The CVWMP is an integral part of the Basin Plan and should be included in the Basin Plan discussion and referenced.	The Basin Plan has been updated multiple times since 1992 by other amendments; 1992 is the year of the last major updates to the Salton Sea discussion. The purpose of this Amendment is to update language that is directly related to the Salton Sea, and to correct general errors. The Coachella Valley Water Management Plan is not related to the purpose of this Amendment. Staff does not propose any changes to the Amendment in response to this comment.

Comment #	Location in the Amendment	Comment	Response
JG-2.1	multiple	With regard to using TDS and salinity interchangeably in the staff report, [...] there are notable differences between the two. Salinity is a measure of all dissolved salts, while TDS is a measure of all ion particles, not just salts. In other words, all salts are total dissolved solids, but not all total dissolved solids are salts. This difference is miniscule in “clean” water, but in sea water, especially one as polluted as Salton Sea, the difference can be significant. The TDS section might also confuse the reader because it presents two historical concentrations in TDS units, then goes on to state an objective concentration in salinity units.	<p>The staff report itself does not mention total dissolved solids (TDS); the commenter appears to be referring to text in the Amendment. In the existing Basin Plan, TDS and salinity are used interchangeably in reference to the Salton Sea, which is explained twice: in Chapter 3, Section III.C.1 in the section title "Total Dissolved Solids (Salinity)" and in Chapter 4, section IV. B, in a sentence that reads "Salinity and total dissolved solids are considered equivalent for this discussion."</p> <p>Because the term “salinity” can be somewhat ambiguous compared to “TDS,” and because all salinity values for the Salton Sea are presented in milligrams per liter in the Basin Plan, staff concludes that the original figures presented were measured as TDS. The Amendment was written to be consistent with existing language in the Basin Plan by using the term “salinity” and presenting the values in milligrams per liter. The last sentence in this comment does not appear to reflect either the existing Basin Plan or Amendment language, as Salton Sea’s salinity is presented in mg/L throughout both documents. Staff concludes that using TDS and salinity interchangeably is acceptable with the definition of the relationship in place. Staff does not propose any changes to the Amendment in response to this comment.</p>
SD-1.1	Ch.4, Sec. IV.B, Paragraph 2	<p>Suggest replacing first sentence with:</p> <p><i>Created in 1993, the Salton Sea Authority (SSA) is a Joint Powers Authority (JPA) responsible for working in consultation and cooperation with the State of California to oversee the comprehensive restoration of the Salton Sea.</i></p>	<p>The sentence proposed by the commenter cannot be placed as proposed due to resulting repetition of SSA's purpose and omission of the end of the original Task Force's activities. Staff proposes to leave the first sentence in the paragraph unchanged and instead revise a portion of the second sentence, resulting in the following first two sentences of the paragraph:</p> <p><u><i>This 1986 Task Force dissolved shortly after the Salton Sea Authority (SSA) was formed in 1993 as a Joint Powers Authority. SSA was established with the goal of overseeing the comprehensive restoration of the Salton Sea in consultation and cooperation with the State of California.</i></u></p>

Comment #	Location in the Amendment	Comment	Response
SD-1.2	Ch.4, Sec. IV.B, Paragraph 3, Sentence 1	[First sentence] refers to "WRO 2002-0013." Should this reference be "Revised WRO 2002-0013?"	The State Water Board refers to the Order's contemporaneous versions as WRO 2002-0013. WRO 2002-0013 has been revised twice: once in 2002, soon after its initial adoption and prior to the QSA by WRO 2002-0016, and once in 2017 by WRO-2017-0134. Mentioning revisions in this paragraph would require going into further detail about the two separate revisions, which is not necessary because the provisions discussed were not changed by the revisions. Staff does not propose any changes to the Amendment in response to this comment.
SD-1.3	Ch.4, IV.B, Paragraph 3, last sentence	Suggest adding the words "the State" between the words "provide" and "enough."	Staff proposes to accept the change as proposed by the commenter, revising the sentence to the following: <u>The 15-year period was meant to provide the state enough time to study the feasibility of long-term restoration actions and begin implementation of any feasible restoration projects.</u>
SD-1.4	Ch.4, IV.B, Paragraph 5	Suggest replacing first sentence with: <i>In May of 2015, Governor Edmund G. Brown formed the Salton Sea Task Force with principle staff and appointed members of the Governor's Office, Natural Resources Agency, California Environmental Protection Agency, State Water Resources Control Board, Air Resources Board and Energy Commission. The Task Force was directed to identify realistic short and medium-term goals to respond to air quality and ecological threats at the sea resulting from scheduled reduced flows of fresh water to the sea.</i>	The text proposed by the commenter is taken directly from the California Natural Resources Agency's web page about the Salton Sea Task Force. Staff proposes to accept the change as proposed by the commenter.
SD-1.5	Ch.4, Sec. IV.B, Paragraph 5, Sentence 2	Our understanding is that the SSMP is led by the CNRA and the SSA is one of many stakeholders.	Staff proposes to remove the words "Salton Sea Authority and the," revising the sentence as follows: <u>The new Salton Sea Task Force recommended the initiation of the Salton Sea Management Program (SSMP) as an inter-agency effort led by the California Natural Resources Agency (CNRA).</u>

Comment #	Location in the Amendment	Comment	Response
SD-1.6	Ch.4, Sec. IV.B, Paragraph 7	Suggest deleting last three sentences of the last paragraph and replacing with: <i>The expiration of the QSA mitigation flows to the Salton Sea at the end of 2017, Mexico's diversions from the New River for reuse and changes in agricultural regulations are all factors in reduced inflows to the Sea and rise in salinity. Additionally, under the QSA, a mitigation program consisting of air quality projects is moving forward to address those impacts associated with the QSA.</i>	Staff proposes to revise the paragraph in the Amendment as discussed in response to comment IID-1.12.
IID-1.1	N/A	[T]he proposed amendment includes modifications throughout the Basin Plan, including each and every chapter, the cover page, the foreword and the table of contents. The magnitude of the modifications and the significance of the matter warrant additional time for public review and comment.	For an administrative amendment, there is no comment period length specified. Staff elected to provide 30 days for public review as a sufficient amount of time for an amendment meant to clarify and update information and that does not have any regulatory significance. The commenter will have an opportunity to submit additional comments during the public hearing on June 14. Staff does not propose an additional review period at this time.
IID-1.2	Foreword and Ch.1, Sec. II, Paragraph 1	[T]his statement of the purposes of the Basin Plan overlooks the specific statutorily required factors to be considered in establishing the water quality objectives of the Basin Plan, which shall include "environmental characteristics of the hydrographic unit under consideration, including the quality of the water available thereto," "water quality conditions that could reasonably be achieved through the coordinated control of all factors which affect water quality in the area" and "economic considerations." If the Basin Plan is going to now list these specific purposes, it should identify the important factors that it must also take into consideration.	Those sections discuss the main components and purpose of the Basin Plan. The factors mentioned by the commenter pertain to the establishment of water quality objectives; these factors are not relevant to the point being conveyed, which is about the purpose of the Basin Plan and not how the Basin Plan can be amended. Staff does not propose any changes to the Amendment in response to this comment.

Comment #	Location in the Amendment	Comment	Response
IID-1.3	Ch.1, Sec. VI.F, Paragraph 2, Sentence 4	Revise the text of "... became an important recreation destination and wildlife habitat..." to "became a recreation destination and important wildlife habitat" given recreational usage over the one hundred-year period has varied widely.	The decline of these uses is explained in the following sentence in the paragraph. Staff does not propose any changes to the Amendment in response to this comment.
IID-1.4	Ch.1, Sec. VI.F, Paragraph 3, Sentence 2	Revise text of "Replenishment of the Salton Sea is predominantly ... " to "Inflows to the Salton Sea are predominantly ... " and modify " ... occasional inflows from storm runoff ... " to "occasional flows from storm runoff ... "	The changes proposed by the commenter are not necessary for clarity. Staff does not propose any changes to the Amendment in response to this comment.
IID-1.5	Ch. 2, Sec. II,	The text notes that the Salton Sea receives drainage from agricultural land in the Imperial and Coachella valleys but fails to mention the Mexicali valley agricultural and industrial drainage, which also supply flows to the Sea.	The purpose of the referenced paragraph is not to identify the composition of inflows to the sea, which is discussed in other sections of the Basin Plan. Staff does not propose any changes to the Amendment in response to this comment.
IID-1.6	Ch. 2, Sec. II, Paragraph 3, Sentence 2	The text notes that agricultural drainage from Palo Verde and Bard valleys discharges to the Colorado River, but fails to note that these discharges comprise part of the Colorado River water deliveries to the Imperial and Coachella valleys.	See response to comment IID-1.8.
IID-1.7	Ch. 2, Sec. II, Paragraph 3, Sentence 3	These sentences should be revised to read: <i>Agricultural drainage discharges consist of surface irrigation runoff and agricultural tile drainage, which comes from percolated irrigation surface water that is collected by subsurface drainage tiles placed beneath the agricultural fields. Subsurface tile drains facilitate the flow of surface water from the crop root zone to maintain field productivity and assist in lowering the composition of dissolved salts imported from the Colorado River source water, which can impair plant growth and yield. Due to the tile drainage system, this surface water never reaches the groundwater table.</i>	See response to comment IID-1.8.

Comment #	Location in the Amendment	Comment	Response
IID-1.8	Ch. 2, Sec. II.4, last sentence	IID also takes exception with the conclusion that the agricultural drainage from irrigated cropland, including subsurface tile drainage "cannot be recognized as a beneficial use ... " pursuant to 40 CFR Section 131.10" when no such conclusion is warranted or necessary and has not been determined as a matter of law. This section of the Basin Plan is intended to identify the beneficial uses, not to single out uses that may not be beneficial uses. This text is unnecessary and the modifications only highlight this issue warranting deletion of the last sentence.	<p>Staff initially proposed to revise this paragraph in the Basin Plan for consistency with the Water Boards' mission and to clarify how tile drainage helps address salinity in soil. After reviewing the referenced paragraph in response to multiple public comments, Staff concludes that the information contained in this paragraph is out of place in this section and is unnecessary and confusing to the reader. This paragraph is located in the introduction and deleting it would not result in a change to actual beneficial uses or have other regulatory consequences. Instead of revising this paragraph of the Basin Plan, Staff proposes to delete the entire paragraph:</p> <p>The primary purpose of the Salton Sea and the agricultural drains in the Imperial, Palo Verde, Coachella, and Bard Valleys is for collection, transport, and/or storage of drainage (including subsurface) waters from irrigated cropland in order to maintain adequate soil salinity balance for agriculture in the Region. Although this is clearly the primary purpose of these waters, this cannot be recognized as a beneficial use in Tables 2-2 and 2-3 since federal regulations specify that waste transport or assimilation cannot be designated as a beneficial use for any waters of the United States (as per Clean Water Act, 40 CFR Section 131.10 (a))</p>
IID-1.9	Ch.3, Sec. III.C.1, Sentence 2	The text regarding stabilization of the Salton Sea at 35,000 mg/L is a carryover from previous documents and is unachievable given current conditions and funding constraints. Consideration should be given to phrasing this previous objective in the past tense and incorporating updated text (after additional time to determine new objectives based on the state's Salton Sea Management Program and other long-term actions).	This text defines a water quality objective and changing it would fall outside of the scope of this non-regulatory Amendment. Amending water quality objectives typically requires completion of an environmental checklist and peer review. Salton Sea water quality objectives may be reviewed in future basin plan amendments. Staff does not propose any changes to this Amendment in response to this comment.

Comment #	Location in the Amendment	Comment	Response
IID-1.10	Ch.3, Sec. III.C.1, Sentence 6	The next to last sentence also states that salinity stabilization is a responsibility that "must be shared jointly by all of the agencies which have direct influence on the sea's fate," but fails to acknowledge the financial limitations on this 'responsibility' to parties of the Quantification Settlement Agreement as outlined in the Legislature and the QSA Joint Powers Authority Creation and Funding Agreement [...] Section 14.3 [...].	The information proposed by the commenter is not relevant in this paragraph and is contained in other appropriate documents. Staff does not propose any changes to this Amendment in response to this comment.
IID-1.11	Ch. 4, Sec. IV.B, next to last sentence	This water is referred to as "mitigation water deliveries." This was not a "transfer" of water to the Salton Sea, but rather mitigation water delivered to the Salton Sea as mitigation for impacts to the Salton Sea. There are other uncorrected references to "mitigation water transfers," which should be changed to "mitigation water deliveries."	Staff proposes to change the words "mitigation water transfer" to "mitigation water deliveries" in the sentence quoted in this comment. See response to comment IID-1.12 for correction of the only other reference to "mitigation water transfers."
IID-1.12	Ch. 4, Sec. IV.B, Paragraph 7, Sentence 2	The revised sentence [...] should be corrected to read: <i>Upon completion of the fifteen-year Salton Sea mitigation water delivery requirement associated with the QSA water conservation and transfer in 2017, the inflows to the Salton Sea associated with Imperial Valley agricultural drainage are projected to decrease significantly.</i>	Staff proposes to revise the paragraph by revising sentence 2 in part as proposed by the commenter, and reverting a change in the last sentence, resulting in the following last three sentences in the paragraph: <i><u>Upon completion of the fifteen-year Salton Sea mitigation water delivery requirement associated with the QSA water conservation and transfer in 2017, the inflows to the Salton Sea are projected to decrease significantly. Any reduction in inflows to the sea will causes the salinity to rise more rapidly. The volumes of flow contributed from Mexico and from stormwater runoff will also have a bearing on the rate of salinity increase in Salton Sea.</u></i>

Comment #	Location in the Amendment	Comment	Response
IID-1.13		This next sentence states, "Any reduction in inflows to the sea causes the salinity to rise more rapidly." While this is generally true given existing inflows, it is a blanket statement that is more accurately phrased as "Reduction of inflows to the sea from existing sources causes the salinity to rise more rapidly."	The change proposed by the commenter is not necessary for clarity or accuracy. Staff does not propose any changes to this Amendment in response to this comment. See response to comment IID-1.12 for changes in other sentences of the paragraph.
IID-1.14	Ch.4, Sec. IV.B	IID suggests additional time should be given to provide a better background and summary of the Salton Sea Management Program, including a better description of the Phase 1 SSMP 10-Year Plan commitments and acreage milestones, as well as the long-term proposals that are currently being vetted through a technical process. Given all of the recent developments including adoption of the stipulated order by the State Water Resources Control Board, this section should be greatly enhanced.	As the commenter pointed out, the long-term proposals are still evolving. Adding excessive detail contained in another document, such as WRO 2002-0013 revisions and SSMP 10-Year plan, or adding information that may change in the near future, may result in the Basin Plan quickly becoming outdated. Because revising the Basin Plan is a resource-intensive process, Staff does not advise incorporating more information than necessary. Information about individual projects may be added to the Basin Plan as necessary for future amendments. Staff does not propose any changes to this Amendment in response to this comment.
IID-1.15	N/A	[IID] feels strongly that additional time is needed to fully consider the many modifications made by the proposed amendment [...] This would include a more thorough review of the Salton Sea discussions, including the drafting of additional text regarding the state's restoration obligations and its Salton Sea Management Program commitments, particularly those specifically delineated in SWRCB Revised Order WR 2017-0134 (modifying Revised Order WRO 2002-0013 and adding conditions 19-29 related to Salton Sea restoration) which were not addressed in the 2017 Triennial Review or these amendments.	See responses to comments IID-1.14 and IID-1.1.